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Federal Communications Commission
Office of the Secretary670 Old Airport Road
Auburn, CA 95603
January 24, 1992

FCC MAIL SECTION

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Federal Communications Commission
Washington D.C. 20554

RE: RM-7869

Dear Sirs:

I wish to submit the following comments in opposition to RM-7869 which would restrict the lower portion of the 220 Mhz allocation in the Amateur Service to weak signal applications.

I was originally licensed in 1954, and, with the exception of four years of military service in Vietnam, I have been active continuously since that time. I have held an Amateur Extra Class license since 1957. I have been a member of the American Radio Relay League (ARRL) for most of my licensed period, and, in general, I support their activities and positions as the unified voice of amateurs. I believe that RM-7869 is poorly conceived, however, and I am opposed to its adoption.

To begin with, I submit that the definition of "weak signal applications" is vague, and unnecessarily restricts certain modes of operation. For example, the Northern California DX Packet Spotting Network operates on 144.950 Mhz. The Reno NV node is connected by an auxiliary link operating on 222.140 Mhz, which would be eliminated by the proposed regulation. There are no remaining coordinated frequencies available for this link in the 220 Mhz band.

This link operates on a non-line-of-sight path using knife edge diffraction over the crest of the Sierra Nevada. By all reasonable measures, it is clearly a "weak signal application" which serves a large number of users on a continuous basis. Yet, under the proposed regulation, it would be prohibited on its currently coordinated frequency. In fact, the DX Packet Cluster concept serves a very large number of amateurs in pursuing a second traditional application of the amateur service (DX), and it does so by cooperatively sharing a very small number of VHF/UHF frequencies. As such, it is an outstanding example of amateur cooperation and synergism.

Second, I believe that any further regulation is unnecessary at this time, and is burdensome to the service. Traditional weak signal applications are not widespread, and represent a very small segment of the amateur service. Voluntary cooperation through band planning by amateur committees with broad representation has worked very well in most cases (particularly at VHF and above), and offers the best, most flexible means to maximize the use of the available allocated spectrum.


Third, I submit that, contrary to the usual processes within the ARRL, this particular petition was not subjected to broad amateur

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community review before submission. This is not at all characteristic of the ARRL which has a long history of wide, enlightened, and democratic representation of the total amateur community.

Finally, the amateur service has just undergone a contraction of the 220 Mhz band, and our various coordinating bodies, committees and associations are still working out equitable band plans. This process is not speedy, given the "amateur" nature of the service. Further regulation and restriction at this time will only slow and complicate that process. I strongly recommend that the Commission deny the petition, and allow the amateur infrastructure to work unfettered by additional regulation.

Sincerely,


Fred C. Jensen
K6DGW

cc: Mr. Chris Imlay
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Washington, D.C. 20036